

EXHIBIT A

Jacob M. Harper (SBN 259463)
jacobharper@dwt.com
Heather F. Canner (SBN 292837)
heathercanner@dwt.com
Joseph Elie-Meyers (SBN 325183)
josepheliemeyers@dwt.com
DAVIS WRIGHT TREMAINE LLP
350 South Grand Avenue, 27th Floor
Los Angeles, CA 90071
Telephone: (213) 633-6800
Fax: (213) 633-6899

*Counsel for Defendant
Walmart Inc.*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

EDIE GOLIKOV, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

WALMART INC.,

Defendant.

Case No. 2:24-cv-08211-RGK-MAR

**DEFENDANT WALMART INC.'S
INTERROGATORIES TO
PLAINTIFF, SET ONE**

Assigned to the Hon. R. Gary Klausner

Compl. filed: September 24, 2024
FAC filed: December 30, 2024

PROPOUNDING PARTY: Defendant Walmart Inc.

RESPONDING PARTY: Plaintiff Edie Golikov

SET NUMBER: One

Pursuant to Federal Rules of Civil Procedure 26 and 33, Defendant Walmart Inc. (Walmart) requests that Plaintiff Edie Golikov provide complete responses to the following Interrogatories (Interrogatory or Interrogatories) no later than 30 days after service at the law firm of Davis Wright Tremaine LLP, 350 South Grand Avenue, 27th Floor, Los Angeles, CA 90071.

DEFINITIONS

A. “YOU” or “YOUR” as used herein means Edie Golikov, and her managers, attorneys, and agents or representatives acting on her behalf.

B. “WALMART” as used herein means Defendant Walmart Inc.

C. “HOUSEHOLD MEMBERS” as used herein means YOU and anyone who has made or may have made any purchase of grocery or household goods for YOUR household, including but not limited to any caregivers and persons residing with YOU.

D. “COMMUNICATION” or COMMUNICATIONS” as used herein means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise) whether orally, in writing, or otherwise, and includes without limitation, meetings, personal conferences, telephone conferences, voicemail messages, memoranda, notes, letters, electronic mail, social media posts, and other computer-generated messages, and instant and text messages.

E. “DOCUMENT” or “DOCUMENTS” is defined to be synonymous and equal in scope to usage of this term in Rule 34(a) of the Federal Rules of Civil Procedure. A copy or duplicate of a DOCUMENT which has any non-conforming notes, marginal annotations or other markings, and any preliminary versions, draft or revision of the foregoing is a separate DOCUMENT within the meaning of this term. DOCUMENTS include, by way of example only, any memorandum, letter, envelope, correspondence, electronic mail, text, direct message, report, note, Post-It, message, telephone message, telephone log, diary, journal, appointment calendar, calendar, group scheduler calendar, drawing, painting, accounting paper, minutes,

1 financial report, accounting report, work papers, drafts, facsimile, index, chart,
2 graph, index, computer disk, or any other written, printed, typed, filmed, or graphic
3 matter however produced or reproduced, and any other COMMUNICATIONS.

4 F. "COMPLAINT" as used herein means the operative First Amended
5 Complaint in the case *Edie Golikov v. Walmart Inc.*, filed on December 30, 2024
6 (ECF No. 31), in the United States District Court for the District of Central
7 California, Case No. 2:24-cv-08211.

8 G. The terms "and" and "or" shall be construed either conjunctively or
9 disjunctively as necessary to bring within the scope of the request all responses that
10 might otherwise fall outside the scope of the request.

11 H. The terms "all," "any," "each," and "every" encompass any and all of
12 the matter discussed.

13 I. The use of singular form includes plural, and vice versa.

14 J. The use of present tense includes past tense, and vice versa.

15 **INSTRUCTIONS**

16 1. You are to answer each Interrogatory separately and as completely as
17 possible.

18 2. Each Interrogatory must be answered on the basis of YOUR entire
19 knowledge, including all information in the possession of YOUR agents,
20 representatives, and attorneys. YOU may not give lack of information or
21 knowledge as an answer or as a reason for failure to answer unless YOU state that
22 YOU have made a reasonable inquiry and that information known or readily
23 obtainable by YOU is insufficient to enable YOU to answer the substance of the
24 Interrogatory. If the answer to any Interrogatory is that YOU lack knowledge of
25 some or all of the requested information, describe all efforts made by YOU to
26 obtain the information necessary to answer the Interrogatory.

27 3. If YOUR answer is qualified in any particular, please set forth the
28 exact nature and extent of the qualification.

1 4. If YOU assert a privilege in response to any Interrogatory, state the
2 nature of the privilege(s) asserted, specify the ground(s) therefor, identify the
3 person or persons making or receiving the information, identify each other person
4 who has seen or had possession of the information, specify the date on which the
5 information was transmitted or received, and provide all information responsive to
6 the request which does not fall within YOUR claim of privilege. If an objection,
7 other than a claim of privilege, is made to part of any Interrogatory, please specify
8 the part.

9 5. The fact that an Interrogatory calls in part for Documents or
10 Communications that YOU claim to be privileged is not a basis for YOU to fail to
11 identify fully all Documents or Communications called for by such Interrogatory as
12 to which no privilege is claimed.

13 6. Where the answer to an Interrogatory is based on a Document, YOU
14 shall produce a copy of the Document along with YOUR responses to these
15 Interrogatories. If the Document has more than one page, refer to the page and
16 section where the information relevant to the answer can be found.

17 7. These Interrogatories are to be regarded as continuing pursuant to
18 Federal Rule 26(e). YOU are required to provide, by way of supplementary
19 responses hereto, such additional information as may be obtained by YOU or any
20 Person acting on YOUR behalf that will augment or modify YOUR responses now
21 given to the following Interrogatories. Pursuant to Federal Rule 26(e), YOU are
22 required to supplement these responses without a specific request from Walmart.

23 **INTERROGATORIES**

24 **INTERROGATORY NO. 1:**

25 Identify all accounts that HOUSEHOLD MEMBERS, including YOU, have
26 created on Walmart.com during the past 6 years, including the account numbers,
27 username, email addresses, and telephone numbers associated with the account,
28

1 when the account was created, and the date of any purchases made through that
2 account.

3 **INTERROGATORY NO. 2:**

4 Identify all HOUSEHOLD MEMBERS' (including YOU) club, membership,
5 loyalty, and/or rewards cards with WALMART during the past 6 years, including
6 the associated name, telephone number, email address, and physical address; the
7 account or rewards number; the date the HOUSEHOLD MEMBER signed up for
8 the card and whether it was done online, over the phone, or in person; and the date
9 of any purchases made through or associated with that card.

10 **INTERROGATORY NO. 3:**

11 Identify all contact information for HOUSEHOLD MEMBERS, including
12 YOU, during the past 6 years, including all email addresses, telephone numbers,
13 WhatsApp numbers, Google Voice numbers, Slack ID, Telegram ID, Facebook
14 messenger accounts, or any other communication platform identification, such as a
15 screenname.

16 **INTERROGATORY NO. 4:**

17 Identify all addresses where YOU have resided over the past 15 years.

18
19 Dated: March 18, 2025

DAVIS WRIGHT TREMAINE LLP

20 By: 

21 Jacob M. Harper

22 Attorneys for Defendant
23 Walmart Inc.
24
25
26
27
28

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 350 South Grand Avenue, 27th Floor, Los Angeles, CA 90071.

On March 18, 2025, I served the document described as “**DEFENDANT WALMART INC.’S INTERROGATORIES TO PLAINTIFF, SET ONE**” upon the interested parties in this action addressed as follows:

PLEASE SEE ATTACHED SERVICE LIST

 X (VIA U.S. MAIL) I placed such envelope(s) with postage thereon fully prepaid for deposit in the United States Mail in accordance with the office practice of Davis Wright Tremaine LLP, for collecting and processing correspondence for mailing with the United States Postal Service. I am familiar with the office practice of Davis Wright Tremaine LLP, for collecting and processing correspondence for mailing with the United States Postal Service, which practice is that when correspondence is deposited with the Davis Wright Tremaine LLP, personnel responsible for delivering correspondence to the United States Postal Service, such correspondence is delivered to the United States Postal Service that same day in the ordinary course of business.

 (VIA PERSONAL SERVICE) I caused the above-named documents to be served on all other parties to this action by requesting that a messenger from GLOBAL NETWORK LEGAL SUPPORT deliver true copies of the above-named documents enclosed in sealed envelopes.

1 X (VIA EMAIL) By forwarding a portable document file to the electronic mail
2 address(es) below from electronic mail address annajimenez@dwt.com, at
3 350 South Grand Avenue, 27th Floor, Los Angeles, CA.

4 _____ (VIA OVERNIGHT DELIVERY) by placing a true copy or original in a
5 separate envelope for each addressee named above, with the name and
6 address of the person served shown above on the envelope, sealing the
7 envelope and placing it for collection and delivery by FEDERAL EXPRESS
8 with delivery fees paid or provided for in accordance with ordinary business
9 practices.
10

11 Executed on March 18, 2025, Los Angeles, California.

12 X Federal I declare under penalty of perjury under the laws of the United States
13 of America that the foregoing is true and correct and that I am employed in
14 the office of a member of the bar of this Court at whose direction the service
15 was made.
16

17 
18 ANNA JIMENEZ
19
20
21
22
23
24
25
26
27
28

SERVICE LIST

DOVEL & LUNER, LLP Richard Lyon Stephen D. Andrews Christin Cho 201 Santa Monica Blvd., Suite 600 Santa Monica, California 90401 Telephone: (310) 656-7066 Email: rick@dovel.com Email: stephen@dovel.com Email: christin@dovel.com	<i>Attorneys for Plaintiff Edie Golikov</i>
--	---